



FERTITTA REYNAL LLP

## Fertitta Reynal LLP

917 Franklin  
Sixth Floor  
Houston, 77002  
areynal@frlaw.us  
www.frlaw.us  
O: 7132285900

## INVOICE

Number	340
Issue Date	10/29/2022
Due Date	10/29/2022
Email	melinda@freespeechsystems.com

## Bill To:

Jones, Alex

## Time Entries

Time Entries	Billed By	Rate	Hours	Sub
Draft/revise 9/6/2022 Response to motion for sanctions for bad faith removal	Federico Reynal	\$800.00	5.10	\$4,080.00
Plan and prepare for 9/6/2022 Prepare materials in preparation of trial in Connecticut Matter	West Medlin	\$400.00	8.90	\$3,560.00
Draft/revise 9/7/2022 Objection to Entry of Judgement	Federico Reynal	\$800.00	5.00	\$4,000.00
Draft/revise 9/8/2022 Response to Motion for sanctions for bad faith removal	Federico Reynal	\$800.00	5.50	\$4,400.00
Draft/revise 9/9/2022 Objection to motion to enter judgement.	Federico Reynal	\$800.00	1.60	\$1,280.00
Draft/revise 9/10/2022 Response to motion for sanctions for bad faith removal	Federico Reynal	\$800.00	5.80	\$4,640.00
Draft/revise 9/11/2022 Response motion for sanctions for bad faith removal	Federico Reynal	\$800.00	2.50	\$2,000.00
Review/analyze 9/12/2022 Review and analyze Plaintiffs' motion for advisory jury findings on CUPTA punitive damages in Connecticut	West Medlin	\$400.00	0.30	\$120.00
Draft/revise 9/12/2022 Response motion for sanctions for withheld text messages.	Federico Reynal	\$800.00	2.00	\$1,600.00

Time Entries	Billed By	Rate	Hours	Sub
Review/analyze 9/13/2022 Monitored proceedings in Connecticut trial: pre-trial motions; opening statements; testimony of Mr. Aldenberg and Ms. Soto.	Federico Reynal	\$800.00	7.10	\$5,680.00
Communicate (with client) 9/14/2022 Teleconference with client and Norm Pattis	Federico Reynal	\$800.00	0.50	\$400.00
Review/analyze 9/14/2022 Reviewed first part of Alex Jones Testimony in Heslin Matter	Federico Reynal	\$800.00	1.60	\$1,280.00
Communicate (other external) 9/14/2022 Teleconference with Eric Nichols and Chris Martin regarding Sanctions hearing and Objection to motion for entry of judgement.	Federico Reynal	\$800.00	0.60	\$480.00
Other 9/15/2022 Travel to Austin to prepare client to testify.	Federico Reynal	\$400.00	5.00	\$2,000.00
Meeting with client 9/16/2022 Witness prep with client.	Federico Reynal	\$800.00	1.50	\$1,200.00
Other 9/19/2022 Travel to Connecticut	Federico Reynal	\$400.00	2.00	\$800.00
Plan and prepare for 9/19/2022 Meeting with Norm Pattis to discuss and plan direct and cross-examinations of Brittany Paz, Clint Watts and Alex Jones; discussed general case strategy.	Federico Reynal	\$800.00	3.30	\$2,640.00
Communicate (with client) 9/19/2022 Witness prep.	Federico Reynal	\$800.00	1.50	\$1,200.00
Appear for/attend 9/20/2022 Alex Jones Trial in Waterbury, Connecticut	Federico Reynal	\$800.00	7.30	\$5,840.00
Appear for/attend 9/21/2022 Connecticut Trial.	Federico Reynal	\$800.00	7.00	\$5,600.00
Meeting 9/21/2022 Witness prep with client.	Federico Reynal	\$800.00	2.30	\$1,840.00
Appear for/attend 9/22/2022 Alex Jones Connecticut Trial	Federico Reynal	\$800.00	8.00	\$6,400.00
Appear for/attend 9/23/2022 Alex Jones Connecticut Trial	Federico Reynal	\$800.00	1.50	\$1,200.00
Other 9/23/2022 Travel.	Federico Reynal	\$400.00	2.50	\$1,000.00
Review/analyze 9/27/2022 Response to motion for sanctions for trial misconduct.	Federico Reynal	\$800.00	1.20	\$960.00

Time Entries	Billed By	Rate	Hours	Sub
Research 9/29/2022 Research and analyze CUPTA damages regarding Connecticut matter	West Medlin	\$400.00	1.50	\$600.00
Draft/revise 10/4/2022 Edited response to sanctions motion.	Federico Reynal	\$800.00	1.00	\$800.00
Draft/revise 10/4/2022 Response to motion for sanctions for trial misconduct	Federico Reynal	\$800.00	5.70	\$4,560.00
Communicate (other outside counsel) 10/7/2022 Conference call with Chris Martin, Shelby Jordan and Eric Nichols	Federico Reynal	\$800.00	1.50	\$1,200.00
Review/analyze 10/10/2022 Memo from Shelby Jordan regarding sanctions for bad faith removal	Federico Reynal	\$800.00	0.50	\$400.00
Draft/revise 10/11/2022 Response to motion for sanctions for trial misconduct	Federico Reynal	\$800.00	5.70	\$4,560.00
Draft/revise 10/12/2022 Response to motion for sanctions for trial misconduct	Federico Reynal	\$800.00	7.20	\$5,760.00
Draft/revise 10/13/2022 Review testimony of Neil Heslin and Scarlett Lewis	Federico Reynal	\$800.00	4.20	\$3,360.00
Draft/revise 10/13/2022 Reviewed and commented on Response to Motion to Enter Judgement; Motion to Amend and Motion for Sanctions.	Federico Reynal	\$800.00	5.20	\$4,160.00
Review/analyze 10/17/2022 Memo from Shelby Jordan regarding appellate bond issues in Texas and Connecticut	Federico Reynal	\$800.00	1.00	\$800.00
Time Entries Total			123.10	\$90,400.00

## Expenses

Expense	Billed By	Price	Qty	Sub
Out-of-town travel 8/18/2022 Flight to CT	Federico Reynal	\$1,521.10	1.00	\$1,521.10
Out-of-town travel 8/18/2022 Hotel CT	Federico Reynal	\$377.20	1.00	\$377.20
Out-of-town travel 8/27/2022 Fuel in CT	Federico Reynal	\$25.28	1.00	\$25.28
Out-of-town travel 9/17/2022 Rental Car-CT	Federico Reynal	\$419.91	1.00	\$419.91

Expense	Billed By	Price	Qty	Sub
Out-of-town travel 9/17/2022 Hotel in CT for hearing.	Federico Reynal	\$1,678.47	1.00	\$1,678.47
Trial transcripts 9/29/2022 Trial transcript copy	Federico Reynal	\$2,606.72	1.00	\$2,606.72
Out-of-town travel 10/20/2022 Hotel San Jose	Federico Reynal	\$614.25	1.00	\$614.25
Private investigators 10/1/2022 This invoice covers professional investigative consulting services from August 1, 2022 thorough September 26, 2022, on behalf of the following matter:  A. Jones, Travis Co. & CT Civil Suits		\$3,953.59	1.00	\$3,953.59
<b>Expenses Total:</b>			<b>8.00</b>	<b>\$11,196.52</b>

Total (USD)	\$101,596.52
Paid	\$0.00
Balance	\$101,596.52

## Account Summary

Trust Account Balance

\$216.93 USD

Non-Trust Retainer Balance

\$0.00 USD



**THE REYNAL LAW FIRM, P.C.****INVOICE**

**713.228.5900**  
**areynal@rlaw.us**

917 Franklin St., Sixth Fl.  
Houston, Texas 77002

Attention Alex Jones  
Free Speech Systems  
Date: 12/1/22

From: 11/17/22

To: 11/30/22

Project Title: State and Federal Court Litigation involving Free Speech Systems and Alex Jones  
Terms: on receipt

Date	Description	Keeper	Time	Cost
11/17/22	5Th Cir. Status Report	FAR	0.5	400
11/18/22	Teleconference with S. Jordan	FAR	0.5	400
	Reviewed Transcripts in preparation for hearing	FAR	4.2	3360
11/21/22	Drive to Austin	FAR	3	1200
	Hearing Prep	FAR	8	6400
11/22/22	Prepared for and participated in Hearing	FAR	8	6400
	Drive to Houston	FAR	3	1200
11/23/22	Teleconference with Norm Pattis	FAR	0.5	400
	Reviewed and drafted correspondence concerning legal question	FAR	0.5	400
11/30/22	Teleconference with Norm Pattis	FAR	0.5	400
	Teleconference with S. Jordan and Client	FAR	1	800
Total				<b>\$21,360.00</b>
Past Due				
Grand Total				<b>\$21,360.00</b>



**THE REYNAL LAW FIRM, P.C.**

Invoice

From: 12/06/22

To: 12/13/22

## INVOICE

713.228.5900  
areynal@rlaw.us

917 Franklin St., Sixth Fl.  
Houston, Texas 77002

Attention Alex Jones  
Free Speech Systems  
Date: 1/12/23

Project Title: State and Federal Court Litigation involving Free Speech Systems and Alex Jones  
Terms: on receipt

Date	Description	Keeper	Time	Cost
12/06/22	Review draft of Plaintiff's proposed order on sanctions; Research same	FAR	2.6	2,080
12/09/22	Research and outline potential objections to proposed sanctions orders	FAR	2	1600
12/11/22	Prepare objections to proposed sanctions orders	FAR	1	800
12/12/22	Prepare, revise and finalize objections to proposed sanctions orders.	FAR	6	4,800
12/13/22	5Th Cir. Status Report	FAR	0.5	400
Total				<b>\$9,680.00</b>
Past Due				
Grand Total				<b>\$9,680.00</b>



# THE REYNAL LAW FIRM, P.C.

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February 2, 2023

Ray Battaglia  
66 Granburg Circle  
San Antonio, Texas 78218

Attorney for Debtor, Free Speech Systems

Vickie Driver  
2525 McKinnon St., Suite 425  
Dallas, Texas 75201  
Attorney for Debtor, Alex Jones

Re: Invoice for services rendered to FSS and Alex Jones in January, 2023

<b>Time Keeper F. Andino Reynal</b>			
<b>Date</b>	<b>Description</b>	<b>Time</b>	<b>Total</b>
23.01.13	Reviewed signed orders	0.5	400
23.01.16	Telecon with Shelby Jordan; Telecon with Chris Martin	0.5	400
23.01.17	Telecon with Ray Battaglia	0.3	240
	Telecon with Vickie Driver	0.5	400
	Research Motion for JNOV; Research for Motion New Trial	4.7	3760
23.01.23	Reviewed letter from Mark Bankston	0.1	80
	Reviewed Chap. 73 regarding retraction	0.5	400
	Telecon with Chris Martin	0.2	160
	Reviewed Piers Morgan Interview with Alex Jones	0.7	560
23.01.24	Teleconference with Alex Jones and Shelby Jordan	0.6	480
	Email to InfoWars requesting Aug. 2 tape	0.2	160
23.01.25	Email to Battaglia re: document production to Creditors	0.1	80
23.01.26	Email to Martin, Jordan, Battaglia and Driver re: CONFIDENTIAL	0.8	640
	Telecon with Client	0.5	400



	Telecon with co-counsel regarding late filed exhibit	0.5	400
	Research and draft Motion to strike	1.5	1200
TOTAL			\$9,760.00

**Time Keeper Westley Medlin**

Date	Description	Time	Total
23.01.26	Review and analyze text messages; research legal authority regarding unauthorized disclosure of private information and phone numbers; review and edit motion to strike plaintiffs' notice of filing supplemental exhibits	3.0	\$1,200.00
	Legal research regarding finality of motions and improper request for court to consider evidence regarding a motion already ruled on.	1.3	\$520.00
23.01.30	Strategy meeting w/ lead attorney	0.4	\$160.00
TOTAL			\$1,880.00

**Grand Total: 11,640.00**  
**Payable on receipt**

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**THE REYNAL LAW FIRM, P.C.**

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May 22, 2023

Ray Battaglia 66 Granburg Circle San Antonio, Texas 78218 Attorney for Debtor, Free Speech Systems	Vickie Driver 2525 McKinnon St., Suite 425 Dallas, Texas 75201 Attorney for Debtor, Alex Jones
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Re: Invoice for services rendered to FSS and Alex Jones from February 1 through April 6, 2023.

**Time Keeper    F. Andino Reynal (\$800/hour)**

Date	Description	Time	Total
23.02.1	Teleconference with client	1	800
	Teleconference with V. Driver	0.5	400
23.02.09	Teleconference with Client regarding Heslin	0.5	400
23.02.11	Attention to E. Taube Response	1	800
23.02.12	Teleconference regarding attorney client privilege waiver	0.5	400
23.02.13	Review Fourth draft of motion for new trial	1	800
23.02.14	Review draft statement re: demand for retraction	1.5	1,200
23.02.15	Attention to client	0.5	400
23.02.20	Teleconference with Chris Martin Re: Fontaine Hearing	0.5	400
23.02.21	Prepare response re: trial expense Pozner	1	800
	Review supplemental exhibits E. Taube Hearing	1.5	1,200
23.02.27	Review Motion for Sanctions	3.1	2,480
23.03.28	Revised Response to Motion for Sanctions for Motion for New Trial	2.3	2,240
23.03.30	Telecon with Randall Yates at Crowe Dunlevy.	0.5	400

23.04.03	Review Reply to motion for sanctions; prepare for hearing.	3.3	2,640
23.04.04	Drive to Austin	3	1200
23.04.04	Hearing Prep	3.2	2560
23.04.05	Prep for and attend hearing	8	6,400
23.04.06	Prep for and attend hearing	4	3,200
	Drive to Houston	3	1200
23.04.18	Reviewed Correspondence	0.4	320
23.04.19	Teleconference with client	0.5	400
23.05.01	Spot checking production and sharing with BK counsel	3.2	2,560
	Teleconference Vickie Driver	0.4	320
	Teleconference C. Martin	0.2	160
23.05.09	Teleconference with Norm Pattis Re: Appellate Issues	0.4	320
			<b>\$34,000</b>

<b>Time Keeper</b>	<b>West Medlin (400/hour)</b>		
23.02.01	Research case history; filing history; and correspondence history to identify all lawyers that represented Mr. Jones or related entities.	1.3	520
23.03.07	Assemble and prepare materials in furtherance of appeal.	2.3	920
23.03.13	Review and assemble documents and materials in coordination with appellate attorneys.	3.4	1,360
23.03.14	Review and assemble documents and materials in coordination with appellate attorneys.	1.2	480
23.03.28	Review and analyze draft of response to plaintiff's motion for sanctions and motion to strike	1.0	400
23.03.29	Research regarding local filing rules in the subject court; correspondence to appellate attorneys regarding same.	0.4	160

23.04.24	Review; analyze; and assemble production from all outstanding cases	5.1	2,040
23.04.25	Review; analyze; and assemble production from all outstanding cases	3.3	1,320
			<b>\$7,200</b>
	<b>TOTAL PROF. FEES</b>		<b>\$41,200</b>
EXPENSES	2 nights Hotel Austin		\$685.50
	<b>TOTAL EXPENSES</b>		<b>\$685.5</b>

**Grand Total: 41,885.50**  
**Payable on receipt**





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## THE REYNAL LAW FIRM, P.C.

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August 3, 2023

Ray Battaglia 66 Granburg Circle San Antonio, Texas 78218 Attorney for Debtor, Free Speech Systems	Vickie Driver 2525 McKinnon St., Suite 425 Dallas, Texas 75201 Attorney for Debtor, Alex Jones
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Re: Invoice for services rendered to FSS and Alex Jones in June and July, 2023.

**Time Keeper    F. Andino Reynal (\$800/hour)**

Date	Description	Time	Total
06/03/23	5th Cir Status Report	0.2	160
06/18/23	Correspond with Vickie Driver re: Pozner/ Delarosa trial	0.8	640
06/24/23	Review Connecticut brief	0.9	720
	Review transcript of May 19 Status Conference	0.3	240
	Outlining Research Items	0.5	400
06/30/23	Compile potential points of error and circulate among counsel	1.3	1040
	Review correspondence	0.1	80
	Review Record on appeal	1.3	1040
07/3/23	Review Record on appeal	1.5	1200
07/5/23	Teleconference with Bankruptcy Team	1	800
	5th Cir Status Report	0.2	160
07/06/23	Appeal team zoom	0.5	400
07/07/23	Meet with Jury Consultant Re: Pozner case	0.6	480
07/09/23	Legal Research: Law Journal and Austin COA opinions	1.1	880
07/26/23	Transcript Review; issue tagging	1	800

07/28/23	Transcript Review; issue tagging; outlining brief	2.3	1840
07/29/23	Outline brief; legal research	1.7	1360
07/30/23	Transcript review; legal research	2.8	2240
			<b>\$14,480</b>

<b>Time Keeper</b>	<b>West Medlin (400/hour)</b>		
07/17/23	Attention to project regarding review of case transcripts and volumes; discussion with lead attorney regarding same.	0.2	\$80.00
07/23/23	Review and analyze multiple volumes of trial transcript. Create spreadsheet capturing lines relevant to certain appellate issues and arguments.	12.1	\$4,840.00
07/26/23	Review and analyze multiple volumes of trial transcript. Create spreadsheet capturing lines relevant to certain appellate issues and arguments.	3.1	\$1,240.00
	Phone conference with lead attorney regarding trial record and strategy.	0.3	\$120.00
07/27/23	Review and analyze multiple volumes of trial transcript. Create spreadsheet capturing lines relevant to certain appellate issues and arguments.	4.6	\$1,840.00
07/31/23	Review and analyze multiple volumes of trial transcript. Create spreadsheet capturing lines relevant to certain appellate issues and arguments.	8.3	\$3,320.00
			<b>\$11,440</b>
<b>TOTAL PROF. FEES</b>			<b>\$25,920.00</b>

## EXPENSES

<b>TOTAL EXPENSES</b>		<b>0</b>
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**Grand Total: \$25,920**  
**Payable on receipt**



# THE REYNAL LAW FIRM, P.C.

September 8<sup>th</sup>, 2023

Ray Battaglia  
66 Granburg Circle  
San Antonio, Texas 78218  
Attorney for Debtor, Free Speech Systems

Vickie Driver  
2525 McKinnon St., Suite 425  
Dallas, Texas 75201  
Attorney for Debtor, Alex Jones

Re: Invoice for services rendered to FSS and Alex Jones in August and September 2023.

Time Keeper F. Andino Reynal (\$800/hour)			
Date	Description	Time	Total
08/03/23	File Corsi Status Report.	0.2	160
	Transcript Review; issue tagging; outlining brief.	1.5	1,200
08/11/23	Prepare and participate appeal team zoom.	1.8	1,440
	Legal Research improper anchoring; IIED scope vis-à-vis defamation.	2.5	2,000
08/18/23	Prepare and participate appeal team zoom.	1.6	1,280
	Legal Research: Damages Act/Bifurcation; review record citations.	4.3	3,440
08/23/23	Revise argument section regarding bifurcation issue.	2.6	2,080
08/25/23	Prepare and participate in appeal team zoom.	1.4	1,120
08/27/23	Review COA opinion re IIED; research permissible scope of sanction order; issue estoppel.	2.8	2,240
08/30/23	Attention to Pozner file; review of documents and pleadings and discovery.	5.2	4,160
08/31/23	Legal Research regarding amended cap buster claims; penal code provisions regarding injury to a disabled person.	5.7	4,560
9/08/23	Review and revise IIED argument section.	1.4	1,120
			<b>\$24,800</b>

Time Keeper West Medlin (400/hour)			
Date	Description	Time	Total



08/07/23	Revise and edit appellate outline regarding improper evidence permitted in phase one; incorporate record citations and citations to Texas authority regarding improper jury charge as to punitive damages.	3.5	1,400
08/10/23	Additional legal research and transcript review regarding issues in preparation for meeting with appellate attorneys.	6.2	2,480
08/11/23	Strategy meeting with lead counsel and appellate counsel; forward caselaw to appellate counsel.	0.9	360
08/18/23	Prepare for and attend strategy meeting with appellate attorneys regarding next steps.	1.6	640
08/19/23	Legal research of Texas Civil Practice and Remedies Code Section 41 regarding bifurcation and evidence permitted between phase one and phase two of trial; research and analyze Texas caselaw regarding application of TCPRC 41 bifurcation in cases where a default judgment has been rendered.	4.2	1,680
08/20/23	Review and analyze trial transcripts and evidence for citations to plaintiffs using improper evidence regarding exemplary damages in phase one of trial.	4.0	1,600
08/21/23	Continue review of trial transcripts and evidence for citations to plaintiffs using improper evidence regarding exemplary damages in phase one of trial.	5.1	2,040
08/22/23	Begin drafting section of appellate brief regarding trial court's failure to properly bifurcate pursuant to CPRC 41 and error in permitting exemplary evidence in phase one of trial.	6.1	2,440
08/23/23	Legal research regarding appellate review for trial court's violation of statute.	1.7	680
08/24/23	Revise and edit draft section of appellate brief regarding bifurcation.	2.7	1,080
	Meeting with appellate lawyer regarding strategy and document citations from record.	1.1	440
	Review files and case records for video deposition clips played at trial.	1.5	600
08/25/23	Prepare for and attend strategy meeting with lead attorney and appellate team regarding status and next steps.	1.0	400

	Research and analyze motion to dismiss previously filed in Lewis's case regarding discussion of plaintiff's IIED claim; additional legal research regarding IIED claims and their dismissal for being duplicative.	1.3	520
08/26/23	Review and analyze caselaw regarding IIED brought in conjunction with defamation claims and determine circumstances when IIED survives a motion to dismiss.	2.0	800
	Review and analyze procedural history in Lewis's matter regarding handling of IIED claim; review and analyze court of appeal opinion regarding same.	0.8	320
08/27/23	Review and analyze procedural history in both Heslin matters and determine timeline of joining Heslin's IIED suit with Heslin's defamation suit; review and analyze court of appeal opinions regarding Heslin's IIED claim.	1.6	640
08/28/23	Research and analyze Texas legal authority discussing the scope of defamation damages and injuries regarding harassment or ridicule by third parties; review and analyze plaintiff's various petitions regarding allegations of wrongdoing beyond publication of false statements.	2.3	920
	Begin drafting outline of appellate section regarding IIED dismissal; review and analyze trial transcript regarding evidence of wrongdoing independent of the publication of false statements.	4.1	1,640
08/29/23	Review and analyze trial transcript regarding evidence in support of IIED claim.	2.5	1,000
	Draft and revise IIED section of appellate brief incorporating evidence elicited during the testimony of Mr. Heslin; additional legal research regarding IIED claims regarding deceased persons.	8.5	3,400
08/30/23	Revise, draft, and edit IIED section of appellate brief; additional legal research regarding IIED liability for the acts of unrelated third parties.	5.5	2,200
	Draft and edit IIED section of appellate brief.	4.3	1,720
08/31/23	Review and analyze testimony of Dr. Crouch and Scarlett Lewis; incorporate evidence into brief; legal research and analysis regarding liability for harassment of non-parties.	5.1	2,040
09/01/23	Review and analyze legal articles discussing scope of defamation liability.	3.0	1,200
			\$32,240

Time Keeper		Joe Magliolo (\$800/hour)	
Date	Description	Time	Total
8/30/2023	Review pleadings; written discovery	4.3	3440
8/31/2023	Review recent opinions regarding emotional distress; reputational damages; draft proposed scaled voir dire questions	5.1	4080
9/1/2023	Review trial testimony and argument in Heslin v. Jones; review Pozner and De La Rosa Depositions	4.7	3760
9/2/2023	Review recent expert witness cases; review testimony Roy Lubbitt; draft proposed cross-examination questions	5.6	4480
9/3/2023	Review hearing transcripts; Review Jones videos	4.0	3200
			<b>\$18,960</b>
	<b>TOTAL PROF. FEES</b>		<b>\$75,920</b>
EXPENSES			
	<b>TOTAL EXPENSES</b>		<b>\$0</b>

**Grand Total: \$75,920**  
**Payable on receipt**

# THE REYNAL LAW FIRM, P.C.

October 11<sup>th</sup>, 2023

Ray Battaglia  
66 Granburg Circle  
San Antonio, Texas 78218  
Attorney for Debtor, Free Speech Systems

Vickie Driver  
2525 McKinnon St., Suite 425  
Dallas, Texas 75201  
Attorney for Debtor, Alex Jones

Re: Invoice for services rendered to FSS and Alex Jones in September and October 2023.

Time Keeper F. Andino Reynal (\$800/hour)			
Date	Description	Time	Total
09/13/23	Reviewed joint and several liability research and argument section for inclusion in appellate brief.	1.7	1,360
09/27/23	Reviewed argument section related to improper amendment and entry of the judgement for inclusion in appellate brief.	2.4	1,920
09/29/23	Reviewed million-dollar sanction research and briefing for including in appellate brief.	0.8	640
	Prepared for and participated in appellate team meeting.	1	800
10/04/23	Corsi Status Report	0.2	160
10/05/23	Prepared for and participated in appellate team meeting.	1.5	1,200
	Reviewed case law supporting 1st amendment claim.	1.1	880
			<b>6,960</b>

Time Keeper West Medlin (400/hour)			
Date	Description	Time	Total
09/06/23	Review and analyze hearing and trial transcripts regarding jury charge and discussion of joint and several liability as to exemplary damages.	4.6	1,840
09/07/23	Research legal authority regarding possible waiver of objection to joint and several liability in jury charge as to exemplary damages.	3.2	1,280



	Research legal authority regarding possible exceptions to CPRC 41.006 as to exemplary damages.	3.7	1,480
09/08/23	Review and analyze additional legal authority supporting position that jury charges permitting joint and several liability as to exemplary damages, regardless of objections on the record, is reversible error.	4.9	1,960
09/11/23	Begin outlining and drafting portion of appellate brief regarding plaintiffs' failure to secure jury findings of exemplary damages specific to each defendant.	6.2	2,480
09/12/23	Revise and edit portion of appellate brief regarding violations of CPRC 41.006 and joint and several liability as to exemplary damages.	3.5	1,400
09/13/23	Final review and edits to section of appellate brief regarding violations of CPRC 41.006 and joint and several liability as to exemplary damages; forward same to lead attorney for review and comment.	2.9	1,160
09/14/23	Review and analyze Texas rules and authority regarding a party's right to amend pleadings; review and analyze Texas rules and authority regarding limits to exemplary damages.	4.6	1,840
09/15/23	Review and analyze trial transcripts and hearing transcripts regarding plaintiffs' post-trial amendment to petition; review and analyze prior filings in case regarding same.	3.3	1,320
09/18/23	Research and analyze Texas exceptions to exemplary damages cap in civil practice and remedies code; research and analyze caselaw discussing burden of proof as to exemplary damage cap exceptions listed in CPRC 41.008; research and analyze effect of default judgment on a party's ability to amend a petition to include exceptions to statutory cap on exemplary damages; begin outlining and drafting section of appellate brief discussing plaintiffs' post-trial amendment of petition.	7.1	2,840
09/19/23	Continue outlining and drafting section of appellate brief discussing plaintiffs' improper post-trial amendment of petition.	8.4	3,360



09/20/23	Final revisions and edits to section of appellate brief discussing plaintiffs' improper post-trial amendment of petition; forward same to lead counsel for review and comment.	3.6	1,440
09/21/23	Review and edit appellate section regarding improper preservation of IIED claim.	3.1	1,240
09/22/23	Review and analyze prior filings in case regarding sanctions of attorneys' fees awarded to Plaintiffs.	3.6	1,440
09/25/23	Begin outlining section of appellate brief regarding improper levying of attorneys' fees sanctions.	2.2	880
09/27/23	Begin drafting section of appellate brief regarding improper levying of attorneys' fees sanctions	3.1	1,240
09/28/23	Continue drafting section of appellate brief regarding improper levying of attorneys' fees sanctions.	7.3	2,920
09/29/23	Research and analyze Texas case law and authority regarding Rule 215 and limitations on award of attorneys' fees as sanction.	2.2	880
	Strategy meeting regarding status of various projects related to appeal.	0.4	160
	Final review of caselaw and edits to brief regarding improper sanction of attorneys' fees.	1.5	600
			31,760

**TOTAL PROF. FEES****\$38,720****EXPENSES****TOTAL EXPENSES****\$ 0**

**Grand Total: \$38,720.00**  
**Payable on receipt**

# THE REYNAL LAW FIRM, P.C.

November 6<sup>th</sup>, 2023

Ray Battaglia  
66 Granburg Circle  
San Antonio, Texas 78218  
Attorney for Debtor, Free Speech Systems

Vickie Driver  
2525 McKinnon St., Suite 425  
Dallas, Texas 75201  
Attorney for Debtor, Alex Jones

Re: Invoice for services rendered to FSS and Alex Jones in October 2023.

Time Keeper		F. Andino Reynal (\$800/hour)	
Date	Description	Time	Total
10/16/23	Teleconference with Chris Martin	0.3	240
10/17/23	Prepared anticipated budget.	1.2	960
10/25/23	Reviewed Opinion on Dischargeability.	0.7	560
10/31/23	Reviewed and edited draft brief on appeal.	4.3	3,440
	Teleconference with Chris Martin and Vickie Driver.	0.5	400
			<b>5,600</b>

Time Keeper		West Medlin (400/hour)	
Date	Description	Time	Total
10/02/23	Receipt and review of comments and edits to section of appeal regarding IIED being duplicative claim of defamation; incorporate same into brief; review and analyze trial record and procedural history to incorporate additional cites into brief.	5.2	2,080
10/03/23	Receipt and review of comments and edits to section of appeal regarding post-trial petition amendment; incorporate same into brief; further revisions to section regarding effect of amendment on verdict.	5.9	2,360
10/04/23	Receipt and review of comments and edits to section of appeal regarding improper bifurcation; incorporate same into brief; additional review of trial record regarding instances of bifurcation failure; incorporate same into brief.	6.1	2,440

10/05/23	Receipt and review of comments and edits to section of appeal regarding joint and several liability of exemplary damages; incorporate same into brief; further revisions to section regarding jury verdict and final judgment.	1.6	640
	Legal research and analysis of caselaw discussing suppression of speech by social media companies unduly influenced by government.	2.0	800
10/06/23	Legal research regarding a party's ability to present duplicative evidence of a legal position no longer in dispute, in support of section of appellate brief regarding improper bifurcation.	2.2	880
10/10/23	Review and analyze caselaw regarding scope of first amendment protections in furtherance of section of appeal regarding same; review case record for citations in support of section of appeal regarding IIED.	4.7	1,880
10/11/23	Receipt and review of statement of case and statement of facts sections of appeal; strategize edits and improvements to same; review of record for additional citations.	1.9	760
10/12/23	Meeting with co-counsel regarding appellate brief; review edit, and draft portion of introduction, statement of facts, and multiple substantive sections.	7.2	2,880
10/13/20	Draft and edit statement of case and statement of facts sections of appeal.	4.1	1,640
10/18/23	Edit and revise introduction to appellate brief.	3.1	1,240
	Strategy meeting with co-counsel regarding appeal.	2.3	920
10/19/23	Legal research regarding standard for imposition of sanctions and standard of review of sanctions.	1.9	760
	Legal research regarding discussion of the sanctionability of out of court statements and their interplay with first amendment protections.	4.6	1,840
10/20/23	Legal research regarding a trial court's evidentiary decision concerning partial completeness of evidence as error in support of appellate brief; strategize and draft portions of brief sections regarding death penalty sanctions, adverse inferences, and first amendment protections.	5.0	2,000
10/23/23	Strategize and draft additional portions of statement of facts and statement of the case.	4.0	1,600



10/24/23	Revisions and edits to appeal brief; review trial court record and incorporate citations into brief; review and analyze appellate record and incorporate document citations into brief; cross-check legal citations and incorporate additional legal authority into brief.	7.0	2,800
10/25/23	Strategize and outline additional section of appellate brief regarding IIED and the effect of default judgment on same.	5.0	2,000
10/26//23	Research and analyze caselaw where defamation against a defined group is actionable; research and analyze caselaw where successful defamation claims included harassment; research and analyze standards of review regarding challenges to sufficiency of evidence to support damages; incorporate research into section of brief regarding insufficiency of IIED damages evidence.	7.8	3,120
10/27/23	Continue drafting and editing section of appellate brief regarding lack of evidence supporting IIED damages; review and analyze plaintiffs' petition to determine allegations supporting IIED claims; draft outline regarding challenge to default judgment on IIED claim; review procedural history and draft timeline of Lewis IIED case, Heslin defamation case, and Heslin IIED case.	6.5	2,600
10/30/23	Continue review of procedural history and draft timeline of Lewis IIED case, Heslin defamation case, and Heslin IIED case; revise and edit full appellate brief; edit order and headings.	4.1	1,640
10/31/23	Begin drafting legal authority of section of appellate brief regarding improper granting of default judgment as to IIED claims.	4.3	1,720
			<b>\$38,600</b>

<b>Time Keeper</b>	<b>Lynn Hardaway (\$800/hour)</b>
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<b>Date</b>	<b>Description</b>	<b>Time</b>	<b>Total</b>
10/11/23	Drafted memo and legal research; Reviewed TX statutes; Reviewed proceedings and decisions on issue	4.8	3,840
			<b>\$3,840</b>

<b>TOTAL PROF. FEES</b>			<b>48,040</b>
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## EXPENSES

TOTAL EXPENSES	\$48,040
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**Grand Total: \$48,040**  
**Payable on receipt**

# THE REYNAL LAW FIRM, P.C.

December 5<sup>th</sup>, 2023

Ray Battaglia  
66 Granburg Circle  
San Antonio, Texas 78218

Attorney for Debtor, Free Speech Systems

Vickie Driver  
2525 McKinnon St., Suite 425  
Dallas, Texas 75201  
Attorney for Debtor, Alex Jones

Re: Invoice for services rendered to FSS and Alex Jones in November 2023.

Time Keeper	F. Andino Reynal (\$800/hour)		
Date	Description	Time	Total
11.04.23	revised appellate brief	3	\$2,400
11.05.23	Reviewed appellate brief	2	\$1,600
11.06.23	Reviewed appellate brief	1	\$800
	Status Report to 5th Cir	0.2	\$160
11.07.23	Edited brief on appeal	8	\$6,400
11.08.23	Edited brief on appeal	10	\$8,000
			<b>\$19,360</b>

Time Keeper	West Medlin (400/hour)		
Date	Description	Time	Total
11/01/23	Review and analyze petitions and amendments thereto related to Lewis' standalone IIED claim; Heslin's defamation suit; and Heslin's IIED suit in furtherance of drafting section of appellate brief regarding improper granting of default judgment as to IIED.	3.2	\$1,280.00



11/02/23	Continue reviewing entire record of all three lawsuits before being consolidated in furtherance of drafting procedural timeline for entire matter.	4.4	\$1,760.00
11/03/23	Continue drafting section of appellate brief regarding improper granting of default as to Heslin and Lewis ILED claims.	5.0	\$2,000.00
11/05/23	Revise and edit appellate brief; review and analyze case record and procedural history; incorporate record citations to brief.	5.9	\$2,360.00
11/06/23	Revise and edit appellate brief; strategy meeting with lead attorney regarding same; review and analyze procedural history in Sandy Hook cases and continue drafting timeline.	5.6	\$2,240.00
11/07/23	Review and incorporate additional citations into appellate brief; review and analyze appellate record in furtherance of same; review and analyze legal authority discussing viability of defamation claims against unnamed individuals that are part of a particularized group.	2.8	\$1,120.00
11/08/23	Draft and edit new ILED section in appellate brief merging portions of prior sections; meeting with lead attorney regarding edits and comments of entire appellate brief; implement edits and comments throughout brief; draft and reorganize section of brief regarding post-trial amendments; telephone conference with cocounsel regarding brief.	7.5	\$3,000.00
11/09/23	Final edits and review of appellate brief.	4.1	\$1,640.00
			\$15,400

**TOTAL PROF. FEES****\$34,760**

## EXPENSES

**TOTAL EXPENSES****\$34,760**

Grand Total: \$34,760  
Payable on receipt